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11	kevin@kevinhernandezlaw.com		
12	Attorney for Plaintiffs LISA STAFFORD and MATTHEW STAFFORD		
13			
14	UNITED STATES DISTRICT COURT		
15	DISTRICT OF NEVADA, SOUTHERN DIVISION		
16	LISA STAFFORD, an individual; MATTHEW STAFFORD, an individual;,	Case No. 2:23-cv-0057-DJA	
17 18	Plaintiffs,	STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO RESPOND TO THE COMPLAINT, FIRST	
19	v.	REQUEST REQUEST	
20	CALIBER HOME LOANS, INC., a foreign corporation; EQUIFAX INFORMATION	Complaint filed: January 10, 2023	
21	SERVICES, LLC, a foreign limited-liability company; TRANS UNION LLC, a foreign		
22	limited-liability company;		
23	Defendants.		
24			
25	Plaintiffs Liea Stafford and Matthew Stat	ford ("Plaintiffs") and Defendant Caliber Home	
	Plaintiffs Lisa Stafford and Matthew Stafford ("Plaintiffs") and Defendant Caliber Home		
26	Loans, Inc. ("Caliber") (collectively, "the Parties"), by and through their respective undersigned		
27	counsel, hereby submit this Stipulation for Extension of Time to Respond to the Complaint, in		

light of the following facts:

### **RECITALS**

Plaintiffs initiated this matter by filing a Complaint in the United States District Court, District of Nevada, on January 10, 2023 against Caliber. (ECF No. 1). Caliber was served with the Complaint on or about January 12, 2023, and therefore pursuant to the Federal Rules of Civil Procedure, a response to the Complaint is due from Caliber on February 2, 2023.

The Parties have agreed to extend Caliber's time to respond to the Complaint by 4 weeks to March 2, 2023, which will give Caliber time to investigate the allegations and claims set forth in the Complaint, and for the Parties to consider early dispute resolution.

This is the first stipulation filed by the Parties for an extension of time to respond to the Complaint.

Based on the foregoing, there is good cause to extend Caliber's time to respond to the Complaint to March 2, 2023.

# **STIPULATION**

**THEREFORE**, the Parties, by and through their respective undersigned counsel, stipulate and agree to the above-referenced extension, and respectfully request the Court enter this stipulation as an order:

# SO STIPULATED.

### KLINEDINST PC

DATED: January 25, 2023 By: /s/ Teresa M. Beck

Teresa M. Beck
Taelor S. Evans
Attorneys for Defendant,
CALIBER HOME LOANS, INC.

# LAW OFFICE OF KEVIN L. HERNANDEZ DATED: January 25, 2023 By: /s/ Kevin L. Hernandez. Kevin L. Hernandez, Esq. Attorneys for Plaintiffs LISA STAFFORD and **MATTHEW STAFFORD ORDER** IT IS SO ORDERED: DATED: January <u>27<sup>th</sup></u>, 2023 UNITED STATES MAGISTRATE JUDGE

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1 2	Teresa M. Beck, Nevada Bar No. 15011 Taelor S. Evans, Nevada Bar No. 14704 KLINEDINST PC		
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6	Attorneys for Defendant, CALIBER HOME LOANS, INC.		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA, SOUTHERN DIVISION		
9			
10	LISA STAFFORD, an individual;	Case No. 2:23-cv-0057	
11	MATTHEW STAFFORD, an individual;,	PROOF OF SERVICE	
12	Plaintiffs,		
13	V.		
14	CALIBER HOME LOANS, INC., a foreign corporation; EQUIFAX INFORMATION		
15	SERVICES, LLC, a foreign limited-liability company; TRANS UNION LLC, a foreign limited-liability company;,		
16	Defendants.		
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Case No. 2:23-cv-0057

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### **CERTIFICATE OF SERVICE**

Lisa Stafford, et al. vs. Caliber Home Loans, Inc., et al. 2:23-cv-0057

# STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of San Diego, State of California. My business address is 501 West Broadway, Suite 600, San Diego, California 92101.

On January 27, 2023, I served true copies of the following document(s) described as **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO RESPOND TO THE COMPLAINT, FIRST REQUEST** on the interested parties in this action as follows:

### SEE ATTACHED SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on January 27, 2023, at San Diego, California.

/s/ Patricia A. Schussler
Patricia A. Schussler

Case No. 2:23-cv-0057

KLINEDINST PC 501 WEST BROADWAY, SUITE 600 SAN DIEGO, CALIFORNIA 92101

# SERVICE LIST Lisa Stafford, et al. vs. Caliber Home Loans, Inc., et al. 2:23-cv-0057

Kevin L. Hernandez, Esq. LAW OFFICE OF KEVIN L. HERNANDEZ 8920 W. Tropicana Avenue. Suite 101 Las Vegas, NV 89147 kevin@kevinhernandezlaw.com 

2. Case No. 2:23-cv-0057